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COMPLEX LITIGATION

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July 28, 2021

**VIA ECF**

Honorable Vincent L. Briccetti  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Gerald Hayden v. International Business Machines Corporation, et al  
Civil Action No.: 7:21-CV-02485-VB

Dear Judge Briccetti:

We represent Plaintiff Gerald Hayden and write on behalf of the Parties to jointly request an extension of time for Defendants International Business Machines Corporation (“IBM”), Pablo Suarez, and Shanker Ramamurthy (collectively, the “Defendants”) to move, plead, or otherwise respond to the Amended Complaint (Dkt. 4) in this matter.

The deadline for Defendants’ response is currently August 17, 2021. The parties respectfully request an additional thirty-five (35) days for Defendants to answer or otherwise respond to the Complaint – up to and including September 21, 2021. There have been no previous requests to extend Defendants’ time to respond to the Complaint. Having conferred with Defendants’ counsel, the requested extension will resolve several upcoming scheduling conflicts and provide Defendants with time to investigate the allegations set forth in Plaintiff’s complaint.

Plaintiff and Defendants consent to this extension, which does not affect any other case deadlines.

Thank you.

Respectfully submitted,

*Robert A. Magnanini*  
Robert A. Magnanini, Esq.

cc: Jacqueline M Holmes, Esq. (*via ECF and Electronic Mail*)